**New York State Department of Environmental Conservation**
**50 Wolf Road, Albany, New York 12233**

May 16, 1996

*Michael D. Zagata*
*Commissioner*

Mr. James L. Colter
Remedial Project Manager
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop #82
Lester, PA 19113-2090

Dear Mr. Colter:

Re: Calverton NWIRP Site ID No. 152136

The Department has reviewed the RFA-Sampling Visit Addendum for the Calverton facility dated April 1996 and has the following comments:

1. Page 2-1: The text states there is evidence of solvent contamination in production wells PW2-PW3. Is there a correlation as to whether or not the coal storage pile is the source of the solvent contamination? The problem associated with the production wells was one of the factors for investigating this area. Raw sampling data for PW1, 2 and 3 should be included in the report and figures.

2. Page 2-6: It is indicated that several compounds found were dismissed as laboratory contaminants because they were detected in field blanks. Was this data validated to positively ensure that this is indeed laboratory artifact? This comment pertains to similar sample problems identified throughout the report.

3. Page 2-12: The text states that *"due to the impending transfer of the Calverton property, the chemicals found at this site and their concentrations will be identified on the appropriate transfer documents"*. What will the future use of this area be (commercial, residential), will the production wells need to be utilized by the new owner, will they still require point of use treatment and who will be responsible for maintenance of the system?

4. Figure 3-3: In 1994, monitoring well ECM-GW007 had the highest detected hit of 75 ppb of 1,1,1 TCA. It would appear that additional sample(s) should have been taken from this well to confirm the 1994 data and to determine if the contaminants were still present and at what concentrations.

5. Page 3-11: Please estimate the time frame that you anticipate the VOCs in questions will remain in groundwater from this area.

The conclusion states the highest TCA concentrations are observed off site and downgradient. The Department requests additional monitoring off site to track the plume and to identify potential downgradient receptors.

In Item 3 under Conclusions/Recommendations the text states that *"future use of this property has not indicated that the area's groundwater will be used as a potable water supply and that there will not be any potential receptors...". Therefore no additional investigations or remedial actions are recommended."* The Department is not aware of the future use of this area. An assumption that there will be no potential receptors is not justification to cease an investigation and/or remediation.

6. Page 4-10: Has a floating free product layer been identified at this area as explained in the text. Why weren't soil samples analyzed for VOCs?

7. Page 5-5: The excavation sampling results and the removal date of the underground storage tank should be included in the text.

8. Figure 5-2: The report indicates that the sampling of this area took place within a 60' x 180' area southwest of the engine test house. Why weren't additional groundwater samples taken further downgradient to estimate the areal extent of the contamination? Soil samples should have been analyzed for VOCs. It has not been determined in the report if this area is impacted as a result of an oil spill or release of hazardous waste or what proposed cleanup values will be used.

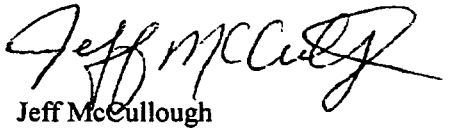
9. Page 5-9: The text states that low level soil contamination appears in two small areas to the southeast. The results for this area indicate sampling was done at the southwest side with contamination found in soil boring ETH-SB01-0810 at 11,300 ppm of total petroleum hydrocarbons (TPH), this is definitely not low level contamination.

10. Page 6-1: Were groundwater samples taken at the groundwater interface? The contaminants in questions may have "sunk" below the screened interval of the monitoring wells and subsequently not detected. The sample results from the Suffolk County wells should be included in the discussion.

11. Page 7-1: What was the depth of the irrigation well sampled? The contaminants in question may have "sunk" below the screened interval of the well sampled. The location of the irrigation well is approximately 3,600 ft. downgradient of FT-MW-05-5. Is sampling an irrigation well this distance from the impacted area representative of off-site conditions? The Department agrees that additional work needs to be done in this area.

If you have any questions, please call me at (518) 457-3976.

Sincerely,



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